

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

WENGUI GUO

v.

BAOSHENG GUO

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Case No. 1:18-cv-01064-TSE-IDD

**MOTION FOR THE JUDGMENT TO BE MARKED AS SATISFIED
ONCE A \$12,000 PAYMENT IS MADE INTO THE REGISTRY OF THE COURT**

NOW COMES Defendant-Counterclaimant Baosheng Guo (“Baosheng”), by and through undersigned counsel, and moves this Court to direct the Clerk to mark the Judgment as satisfied upon full payment of the \$12,000 owed to Wengui Guo directly into the registry of the Court.

While the parties now appear to agree that \$12,000 is the proper amount owed on this Court’s Judgment(s), efforts to agree on the form of that payment, e.g., appropriate payee(s), and the prerequisites and timing of a jointly-filed Satisfaction of Judgment(s), remain unresolved. A copy of counsel’s pertinent emails and attachments (omitting duplicate chain emails), is attached as Exhibit A. While Wengui’s counsel’s last email did express his belief that these differences will get resolved, that email also suggests that Baosheng’s counsel should simply reconsider and accept terms he had previously explained were insufficient. Plaintiffs’ counsel also appears unwilling to accept any payment made in the name of (or even expressly made on behalf of) Wengui Guo, in whole or in part. That may or may not relate to Wengui’s situation vis-à-vis his creditors. But regardless, Court intervention is appropriate at this time. Baosheng has now been willing for two months to pay the \$12,000 he owes, in return for a satisfaction on this Judgment that he can know will truly be final. Baosheng deserves closure without additional delays. If this Motion is granted, Baosheng’s attorney will immediately bring an escrow check to the

Clerk's office, and make a \$12,000 payment, to any payee(s) as this Court directs. Once the Judgment is marked satisfied by the Clerk, Baosheng will then promptly file a dismissal of his appeal with prejudice, in the United States Court of Appeals for the Fourth Circuit.

WHEREFORE, Defendant Baosheng Guo asks that this motion be granted.

Dated: March 6, 2020

Respectfully submitted,

/s/ Gregory S. Smith
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